

ISMAIL J. RAMSEY (CABN 189820)
 United States Attorney
 MICHELLE LO (NYRN 4325163)
 Chief, Civil Division
 PAMELA T. JOHANN (CABN 145558)
 Assistant United States Attorney

450 Golden Gate Avenue, Box 36055
 San Francisco, California 94102-3495
 Telephone: (415) 436-7025
 Fax: (415) 436-6748
 pamela.johann@usdoj.gov

Attorneys for Federal Defendants

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 OAKLAND DIVISION

CALIFORNIA COALITION FOR WOMEN
 PRISONERS, et al.,

Plaintiffs,

v.

UNITED STATES OF AMERICA FEDERAL
 BUREAU OF PRISONS, et al.,

Defendants.

Case No. 4:23-cv-04155-YGR

**STIPULATED REQUEST TO EXTEND
 BRIEFING SCHEDULE ON PLAINTIFFS'
 MOTION FOR A PRELIMINARY INJUNCTION
 (ECF NO. 10) AND MOTION TO CERTIFY
 CLASS (ECF NO. 11); [PROPOSED] ORDER**

Pursuant to Civil Local Rules 6-2 and 7-12, Plaintiffs and the Federal Defendants, United States of America Federal Bureau of Prisons, Bureau of Prisons Director Colette Peters, in her official capacity, and FCI Dublin Warden Thahesha Jusino, in her official capacity, by and through undersigned counsel, submit this stipulated joint request to extend the briefing schedule on Plaintiffs' Motion for a Preliminary Injunction filed on August 17, 2023 (ECF No. 10) and Plaintiffs' Motion to Certify Class (ECF No. 11) (the "Motions").

1. Plaintiffs filed this action on August 16, 2023, against the Federal Defendants and individual officers named in their individual capacity. ECF No. 1.

2. On August 17, 2023, Plaintiffs filed a motion for a preliminary injunction, ECF No. 10,

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 AND MOTION TO CERTIFY CLASS; [PROPOSED] ORDER

1 and a motion to certify class, ECF No. 11.

2 3. On August 18, 2023, the Court issued an order finding this case is related to 4:22-cv-
3 5137-YGR. ECF No. 12.

4 4. The U.S. Attorney's Office was served with a copy of the summons and complaint,
5 Plaintiffs' motion for a preliminary injunction, and Plaintiffs' motion to certify class on August 24,
6 2023.

7 5. At this time, it has not been determined which U.S. Attorney's Office or Department of
8 Justice office will handle representation of the Federal Defendants. Because the representation process
9 involves several considerations and is expected to take some time, the Federal Defendants have
10 requested to extend the briefing on Plaintiffs' two pending motions. In order to give the Government
11 additional time to address the representation issue, the Parties agree to extend the deadline for
12 Defendants' oppositions to the Motions to October 18, 2023, to extend the deadline for Plaintiffs' reply
13 to October 25, 2023, and to re-notice the hearing for a time and date agreeable to the Court. The Parties
14 further agree that the Federal Defendants shall file a response to the Complaint by December 18, 2023.

15 6. To the extent the representation issues remain unresolved, the Federal Defendants may
16 seek an additional extension of these dates by stipulation or administrative motion.

17 7. The Parties acknowledge the Order entered by this Court on July 7, 2023, in *M.R. v. FCI*
18 *Dublin*, 22-cv-05137-YGR, and related cases, staying "[a]ll current cases and any future related civil
19 actions" until Monday, December 18, 2023. The Parties disagree about whether the present case is
20 subject to the stay order.

21 IT IS SO STIPULATED.

22 DATED: September 8, 2023

Respectfully submitted,

23 RIGHTS BEHIND BARS
24 CALIFORNIA COLLABORATIVE FOR
25 IMMIGRANT JUSTICE
ROSEN BIEN GALVAN & GRUNFELD LLP

26 /s/ Kara Janssen
KARA JANSSEN

27 Attorneys for Plaintiffs

28 STIPULATED REQUEST TO EXTEND BRIEFING ON PLAINTIFFS' MOTION FOR A PRELIMINARY INJUNCTION
AND MOTION TO CERTIFY CLASS; [PROPOSED] ORDER

DATED: September 8, 2023

Respectfully submitted,

ISMAIL J. RAMSEY
United States Attorney

/s/ Pamela T. Johann
PAMELA T. JOHANN
Assistant United States Attorney

Attorneys for Federal Defendants

ECF ATTESTATION

In accordance with Civil Local Rule 5-1(h)(1), I, Pamela T. Johann, attest that I have obtained concurrence in the filing of this document from all other signatories listed here.

/s/ Pamela T. Johann
PAMELA T. JOHANN

[PROPOSED] ORDER

Pursuant to the stipulation, briefing on the Plaintiffs' motion for a preliminary injunction and for class certification is extended as follows: Federal Defendants' oppositions to Plaintiffs' motions shall be filed on or before October 18, 2023, and Plaintiffs' replies shall be filed on or before October 25, 2023. The hearing on Plaintiffs' motions is set for _____.

IT IS SO ORDERED.

DATED: _____

HON. YVONNE GONZALEZ ROGERS
United States District Judge